

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

THE UNITED STATES OF AMERICA

v.

HAROLD T. MARTIN

Criminal No. BPG-16-2254

MOTION FOR A DETENTION HEARING

The Defendant, Harold T. Martin, through counsel, respectfully moves for a detention hearing under 18 U.S.C. § 3142(f) to determine whether Mr. Martin should be released pending trial. In support of this motion, Mr. Martin states the following:

1. On August 29, 2016, Harold T. Martin was charged by criminal complaint with theft of government property in violation of 18 U.S.C. § 641 and unauthorized removal or retention of classified documents or materials by a government employee or contractor in violation of 18 U.S.C. § 793(e). Mr. Martin appeared in this Court for his initial appearance on the day he was charged, and he consented to detention at that time. He has not yet been indicted.

2. For more than five weeks, the entire case, including the criminal complaint and the fact of Mr. Martin's arrest and detention, were under seal at the government's request. On October 5, 2016, the government moved, without objection by Mr. Martin, to unseal the case. That motion was granted.

3. Mr. Martin respectfully requests a hearing to determine whether he should be released pending trial, and if so, whether any condition or combination of conditions is appropriate to reasonably assure his appearance and the safety of any other person and the community. For reasons that will be discussed in detail at the detention hearing, Mr. Martin should be released

until his trial. Under the Bail Reform Act, there is no presumption of detention in this case. Mr. Martin is neither a flight risk nor a danger to the community, and to the extent either of these factors is a concern, they can be sufficiently addressed with specific release conditions.

4. Mr. Martin respectfully requests that a detention hearing be held on Friday, October 21, 2016. His family will be traveling from out of state to attend the hearing and would like to spend time with him over the weekend. Assistant United States Attorney Zachary Myers is available for a detention hearing on the afternoon of Friday, October 21.

WHEREFORE, Harold T. Martin respectfully requests a detention hearing to determine whether he can be released pending trial.

Respectfully submitted,

/s/

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